

# **EXHIBIT**

# **A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing  
During Summer 2020 Demonstrations

20-cv-8924 (CM)(GWG)

This filing is related to:

ALL CASES

**CONSOLIDATED NOTICE OF  
DEPOSITION PURSUANT TO  
FED. R. CIV. P. 30(b)(6)**

**PLEASE TAKE NOTICE** that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned cases will take the deposition(s) upon oral examination of Defendant, City of New York (the “City”), through one or more agents or other representatives who shall be designated to testify on the City’s behalf, regarding all information known or reasonably available to the City with respect to the Topics for Deposition identified below. The City shall designate the person or persons most knowledgeable and prepared to testify on behalf of the City concerning the Topics for Deposition. Plaintiffs request that the City provide written notice at least five (5) business days before the deposition of (1) the name(s), (2) the employment position(s), and (3) the Topics for Deposition about which each designated individual shall testify on the City’s behalf.

This deposition(s) shall commence at 10:00 a.m. on February 8, 2022, at the Office of the New York State Attorney General, located at 28 Liberty Street, 16th Floor, New York, New York, or at another location to be determined by Plaintiffs, or by remote means (via videoconference) pursuant to Rule 30(b)(4) of the Federal Rules of Civil Procedure, and shall continue from day to day until completion. This deposition(s) shall take place before a notary public or other officer authorized by law to administer oaths.

Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, the deposition will be recorded by a court reporter and/or audiovisual means.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants are required to produce, by electronic delivery, in advance of any given deposition, any and all materials in any form they may have related in any way to the subject matter of that deposition.

You are invited to attend and cross-examine.

Dated: February 2, 2022  
New York, New York

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## **ATTACHMENT A**

### **DEFINITIONS**

1. “Arrest” means an Officer’s seizure, detention, or arrest of a person, including but not limited to for the purpose of issuing them a criminal court or C-Summons (“summons”) or Desk Appearance Ticket (“DAT”) or fully processing them for arraignment.
2. “Curfew Orders” means New York City Mayor Bill de Blasio’s Emergency Executive Orders Nos. 117-119, which imposed curfews in New York City between June 1 and June 7, 2020. The Curfew Orders exempted certain categories of workers that were deemed “essential” (“Essential Workers”), including “police officers, peace officers, firefighters, first responders and emergency medical technicians, individuals travelling to and from essential work and performing essential work, people experiencing homelessness and without access to a shelter, and individuals seeking medical treatment or medical supplies.” Each of the Curfew Orders provided: “Failure to comply with this Order shall result in orders to disperse, and any person who knowingly violates the provisions in this Order shall be guilty of a Class B misdemeanor” under NYC Administrative Code (“AC”) § 3-108. AC § 3-108 contains a knowing intent requirement, as follows: “Any knowing violation of a provision of any emergency measure established pursuant to this chapter shall be a class B misdemeanor punishable by a fine of not more than five hundred dollars, or by imprisonment for not more than three months, or both.”
3. “Kettling,” “kettling tactics” and “encirclement” mean any and all plans, methods, procedures, tactics, strategies, or approaches, by whatever name or characterization, utilized by NYPD to control crowds, address disorderly conduct, and/or effectuate mass arrests and detentions, whether intentional or not, whereby Officers physically surround or otherwise

contain members of the public within an area, leaving them few or no routes of unimpeded egress.

4. “Legal Observer” means an individual who attends a public demonstration to observe and document interactions between law enforcement and demonstrators.
5. “Officer” means a member of service or civilian employee of the NYPD, regardless of rank, including but not limited to any and all officers, detectives, sergeants, lieutenants, captains, inspectors, chiefs, and/or deputy commissioners.
6. “Prosecution” means any actual or potential prosecution of a person Arrested related to the Summer 2020 Protests.
7. “Protest-Related Violation or Offense” means an alleged violation of any of the following laws during a demonstration or protest: New York State Vehicle and Traffic Law (“VTL”) Section 1156(a) (Pedestrians in Roadways); New York State Penal Law (“PL”) Section 240.05 (Riot in the Second Degree); PL Section 240.10 (Unlawful Assembly); PL Section 205.30 (Resisting Arrest); PL Section 195.05 (Obstruction of Governmental Administration in the Second Degree); PL Section 240.20(5) (Disorderly Conduct – Blocking Vehicular or Pedestrian Traffic); PL Section 240.20(6) (Disorderly Conduct – Refusing to Obey a Lawful Dispersal Order); New York City Administrative Code (“NYAC”) Section 3-108 (Executive Order Violation); and NYAC Section 10-110(c) (Parading Without a Permit), and any other offenses with which any individual who participated in any racial justice protests between May 28, 2020 and January 31, 2021 was actually Arrested for and/or charged.
8. “Relevant Policies and Procedures” refers to the policies and procedures of the New York City Police Department and the City of New York concerning:
  - a) Officers’ use of tactics or objects to control crowds during a demonstration or protest;

- b) Officers' use of force, including batons or other instruments, during a demonstration or protest;
- c) Use of force reporting and investigations related to uses of force during a demonstration or protest;
- d) *[blank per the parties' agreed amendments]*
- e) Officers' tactical use of other objects, such as shields and bicycles, during a demonstration or protest;
- f) Officers' use of Oleoresin Capsicum (also known as "OC" or "pepper spray") during a demonstration or protest;
- g) Technical Assistance Response Unit ("TARU") video and audio recording related to a demonstration or protest;
- h) Strategic Response, Strategic Response Group ("SRG"), and Disorder Control Unit operations;
- i) Policing operations, including traffic safety, crowd and disorder control operations, during a demonstration or protest; including use of tactics or encirclement during a demonstration or protest
- j) Officers' use of body worn cameras during a demonstration or protest;
- k) Officers' use of zip-ties or flex cuffs during a demonstration or protest;
- l) *[blank per the parties' agreed amendments]*
- m) Officers' interaction with, and treatment of, Legal Observers during a demonstration or protest;
- n) Officers' interaction with, and treatment of, journalists, reporters, photographers, and members of the press during a demonstration or protest;
- o) Officers' enforcement of any applicable curfews in place during a demonstration or protest, such as the Curfew Orders, including, but not limited to:
  - a. The requirements in the Curfew Orders to give dispersal orders and opportunities to disperse prior to Arrests or Prosecutions for violations of the Curfew Orders;
  - b. The exemptions contained in the Curfew Orders for Essential Workers, including, but not limited to:
    - i. Identifying Essential Workers;
    - ii. The treatment of Legal Observers as Essential Workers; and
    - iii. Allowing Essential Workers who have been Arrested related to purported violations of the Curfew Orders to disperse;

- c. Any requirements or prerequisites for an Officers' initiating an Arrest or prosecution related to a purported violation of the Curfew Orders, including, but not limited to, any requirements that the Officer have personally observed, or be able to identify an Officer who personally observed, a purported violation of the Curfew Orders prior to an Arrest or Prosecution related to a protest violation.
- p) Incident command, chain of command, and command and control during a demonstration or protest and the Summer 2020 Protests; [Covered in deposition topic 6]
- q) Facilitation, accommodation, and escort of demonstrations or protests;
- r) Constitutional rights of people engaged in protests or demonstrations under the First, Fourth, and Fourteenth Amendments, including the need to provide fair warning before making certain Arrests or engaging in certain uses of force;
- s) The need to give dispersal orders and a meaningful opportunity to comply with them before making Arrests for a Protest-Related Violation or Offense at a demonstration or protest;
- t) Racial profiling and Officers' use of race in law enforcement decisions and/or implicit bias
- u) [*blank per the parties' agreed amendments*]
- v) Officers' use of racial slurs or epithets;
- w) Officers' affiliation with or participation in groups or website that promote racists views;
- x) Officers' Arrest of individuals during a demonstration or protest, including procedures for effecting and processing large-scale or mass arrests and use of mass or large-scale arrest processing;
- y) Probable cause to Arrest for a Protest-Related Violation or Offense;
- z) Discretion to Arrest for a Protest-Related Violation or Offense;
- aa) When to process an Arrest for a Protest-Related Violation or Offense for release with a summons or Desk Appearance Ticket, or for arraignment, including during a demonstration or a protest;
- bb) Officers' transportation of people Arrested during or after a demonstration or protest;
- cc) [*blank per the parties' agreed amendments*]

- dd) Officers' provision of medical aid to civilians injured during a demonstration or protest;
  - ee) Officers' wearing of face coverings when interacting with the public during or after a demonstration or protest, including during arrest processing; and
  - ff) Any other policies, procedures, directives or training associated with policing large-scale events, including protests, demonstrations, and events involving civil disobedience.
9. "Summer 2020 Protests" means the protests, demonstrations, and gatherings at each of the "Protest Locations" identified in "Attachment B" hereto.

### **TOPICS FOR DEPOSITION**

**Topic No. 1:** The process of drafting, developing, modifying or revising, reviewing and approving each of the Relevant Policies and Procedures (as agreed at the meet and confer), including the identities of the individuals that developed, drafted, modified or revised and/or approved each Relevant Policy and Procedure and the identities of those who had authority over final approval of each Relevant Policy and Procedure.<sup>1</sup>

**Topic No. 6:** The organizational structure of and chain of command within the NYPD, including both typical chain of command and the chain of command that was operative during the NYPD's response to racial justice protests that took place between May 28, 2020 and January 31, 2021 (including the Summer 2020 Protests), including, but not limited to, policies, practices, and procedures related to: The roles of an Incident Commander at a protest or demonstration; circumstances under which an Incident Commander is assigned or not assigned; factors to be considered related to the determination as to whether to assign an Incident Commander; and

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<sup>1</sup> To the extent documents and information were reviewed or considered in developing, modifying, revising or approving policies and procedures and have not been produced, we will seek to inquire as to the locations of those and the manner of their storage (e.g., electronic, paper, etc.).

when the highest ranking Uniformed Member of the Service is or is not the Incident Commander with respect to a particular incident.

**Topic No. 7:** The policies, procedures, and practices followed by the Mayor, the Mayor's Office, and the New York City Department of Investigation for overseeing, reviewing, and/or monitoring the NYPD's policing of demonstrations or protests, including, but not limited to, the Summer 2020 Protests, and the enforcement of the Curfew Orders at the Summer 2020 Protests.

**Topic No. 8:** Relevant Policies and Procedures in effect during the period May 1, 2020, through the present.

**Topic No. 9:** The development, content and delivery of trainings, guidance or instructions to members of the NYPD, including, but not limited to, through the Police Academy, through the Strategic Response Group/Disorder Control Unit, at the command level, through the Legal Bureau, in-service, or otherwise, between January 1, 2002, and the present, relating to Relevant Policies and Procedures.

**Topic No. 10:** NYPD policies, procedures, directives or training in effect during the period May 1, 2020, through the present, related to the deployment and operations of the Strategic Response Group ("SRG"), including without limitation the Disorder Control Unit, the bicycle unit and any other police subgroup that operates under SRG, including at Demonstrations, as well as the development, content and delivery of trainings, guidance or instructions to members of the NYPD Strategic Response Group, including members of the Disorder Control Unit, received between January 1, 2002, and the present.

**Topic No. 11:** The creation, content, and enforcement of NYPD policies in effect during the period May 2020 through the present, related to racial bias—whether implicit, explicit, or other—in policing, including:

- a. Policies, procedures, or protocols relating to racial profiling;
- b. Officers’ use of race in law enforcement decisions and/or implicit bias;
- c. Officers’ use of racial slurs or epithets; and
- d. Officers’ affiliation with or participation in groups or website that promote racists views,

as well as the development, content and delivery of trainings, guidance or instructions to members of the NYPD or Police Academy received between January 1, 2016 and January 31, 2021, related to racial bias—whether implicit, explicit, or other—in policing.

**Topic 12:** The NYPD’s gathering, analysis, and use of intelligence and information related to the Summer 2020 Protests, in advance of any given protest or in real-time during the Summer 2020 Protests, including but not limited to:

- a. The creation, distribution, and uses of charts and communications containing information about “scheduled” and “unscheduled” events;
- b. Social media and other open-source monitoring and active surveillance, and the NYPD’s process for making decisions about the gathering, assessing and using such intelligence and conducting such monitoring or surveillance;
- c. The NYPD’s process for gathering or developing information on organizations and individuals related to the Summer 2020 Protests, including without limitation individual protest leaders or organizers;
- d. The involvement of the Technical Assistance Response Unit (“TARU”), ARGUS footage, and/or helicopters from the Aviation Unit;
- e. The roles of the Intelligence Division, Counter-Terrorism Bureau, Deputy Commissioner for Public Information,
- f. The uses and roles of plainclothes NYPD members, undercover officers, and informants;
- g. Questioning of arrestees for intelligence-gathering purposes during the Summer 2020 Protests;
- h. The NYPD’s work, coordination, intelligence and/or data sharing (including by the NYPD’s Intelligence Division and/or Counter-Terrorism Bureau) with any other law enforcement entities including but not limited to, members of any Joint Terrorism

Task Force, the Federal Bureau of Investigation, the Department of Justice (such as DEA agents), or other entities related to the Summer 2020 Protests;

- i. The NYPD's analysis and use of intelligence related to the Summer 2020 Protests, after the completion of any Protest;
- j. The source and content of information received or developed by the NYPD indicating that acts of violence, vandalism, or any crimes were planned to take place, or did take place, during any Summer 2020 Protest;

**Topic 13:** The process and substance of NYPD responses and operations relating to the Summer 2020 Protests, including without limitation:

- a. Requests for details and deployments of NYPD members and resources in response to "scheduled" and "unscheduled" events;
- b. Deployment of officers to each Summer 2020 Protest, including legal bureau personnel, TARU Units, and NYPD Strategic Response Group (SRG) Units, and the tracking and identification of NYPD personnel present at each Summer 2020 Protest;
- c. Incident command, chain of command, coordination and command and control during a Demonstration, including the use of the National Incident Management System (NIMS) model or any similar model, during the Summer 2020 Protests; as well as communications between NYPD officers, units, and departments involved in responding to each Protest, including without limitation planning for communication to and from any command centers, joint operation centers, mobile operational units, boroughs, or precincts, and between incident commanders and legal bureau personnel during each Summer 2020 Protest;
- d. Supervision of officers during the Summer 2020 Protests;
- e. Officers' use of body worn cameras during the Summer 2020 Protests;
- f. The NYPD's administration of press passes during the Summer 2020 Protests.
- g. Procedures for the implementation of any of the policies identified in Topic 8 above during the Summer 2020 Protests.
- h. Requirement to create, or not create, after action reports (regardless of the name used to identify such reports) detailing the facts and issues concerning the Summer 2020 Protests.

**Topic 14:** The role of the Legal Bureau in the Summer 2020 Protests, including:

- a. The intended roles of Legal Bureau personnel related to NYPD responses to Demonstrations, including the Summer 2020 Protests, including, but not limited to, giving advice to NYPD decision-makers regarding Arrests, dispersal orders, the use of force, the use of crowd control tactics such as kettling, determining whether a person Arrested at a Demonstration should be released with a summons, desk appearance ticket, or otherwise, determining whether to utilize a Mass Arrest Processing Center, reviewing Arrests for legal sufficiency and/or

- ability to prosecute, and other intended roles regarding arrest processing and/or large-scale or mass arrest processing.
- b. The names of NYPD Legal Bureau personnel who were involved in the NYPD's responses to the Summer 2020 Protests in any way, the dates and times they worked related to the Summer 2020 Protests, the locations to which they were deployed, and the nature and extent of their involvement;
  - c. Whether, and when, any specific guidance was sought concerning any Arrests made at any Summer 2020 Protests by any Incident Commander related to a Protest of any Legal Bureau personnel whether in-person and on the ground in real time, or subsequent to any arrest decision having been made, and, if so, the identities of the Incident Commander(s) and Legal Bureau personnel involved, and the nature of the guidance sought and received;
  - d. Whether any such guidance was identified in any written report regarding any Arrests at any Summer 2020 Protest;
  - e. What training is received by Legal Bureau personnel on the Relevant Policies and Procedures, including, but not limited to, how Legal Bureau personnel are meant to provide guidance concerning Demonstrations, arrests, and probable cause to arrest at Demonstrations, including, but not limited to, probable cause to arrest for a Protest-Related Violation or Offense;
  - f. What directives are provided to Legal Bureau personnel, and to NYPD executive officers, on the interaction between Legal Bureau personnel and the NYPD at protests regarding the establishment of probable cause to effectuate arrests of protesters and others present at protest activity; and
  - g. How such directives are communicated to Legal Bureau personnel and to NYPD executive officers.

**Topic 15:** Instructions given to NYPD members regarding the Curfew Orders and how to implement and/or enforce the Curfew Orders, and the NYPD's implementation and/or enforcement of, the Curfew Orders, including with respect to essential workers and other curfew-exempt individuals and the need to give dispersal orders and meaningful opportunities to comply before taking enforcement action related to the Curfew Orders;

**Topic 16:** The role and operations of the NYPD Strategic Response Group in response to any Demonstration that took place in New York City between May 1, 2020 and the present, including but not limited to the Summer 2020 Protests, including, with respect to each such response:

- a. the NYPD's determination to use, and use of, disorder control tactics;
- b. decisions to deploy SRG Units;
- c. operations of and chain of command for the SRG operations; and

d. the distribution and use of SRG equipment.

**Topic 17:** The initiation, conduct, and outcome of investigations by the NYPD Internal Affairs Bureau and/or the Civilian Complaint Review Board, any local district attorney's office of allegations of misconduct by members of the NYPD during the Summer 2020 Protests.

**Topic 18:** The disciplinary actions, if any, taken by the City of New York against members of the NYPD for their conduct or failure to act during the Summer 2020 Protests.

**Topic 19:** The NYPD's and City of New York's policies and practices regarding the monitoring and review of its large-scale incident responses including the Summer 2020 Protests, including, but not limited to, the review of body worn camera and other video footage, documents (e.g., arrest reports, TRIs), and other information sources, as well any after-action review(s) of the Summer 2020 Protests, including any findings and responses of each such review.

**Topic 20:** The NYPD's and City of New York's response, coordination, and cooperation with investigations by any local district attorney's office, the Civilian Complaint Review Board, the Law Department, or the Department of Investigation of the City of New York into the City's responses to the Summer 2020 Protests, including requests and responses for the production of documents, witnesses, and other information from Defendants.

**Topic 21:** The NYPD's and City of New York's response to:

- a. the investigation and Preliminary Report by the New York State Office of the Attorney General;
- b. Any decisions by any district attorney to decline to prosecute or dismiss a prosecution related to any of the Arrests made during the Summer 2020 Protests.

**Topic 22:** Any policy or practice changes considered or implemented by the NYPD and the City of New York relating to or as a result of the Summer 2020 Protests or after-action

reviews or investigations arising from the Summer 2020 Protests, including any policy or practice changes considered or implemented in response to New York State Executive Order 203 (<https://www.governor.ny.gov/news/no-203-new-york-state-police-reform-and-reinvention-collaborative>) and any such policy and practice changes referred to in Defendants' opposition to the motions to dismiss in these cases.

**Attachment B: List of Protest Locations<sup>2</sup>**

<b><u>Protest No.</u></b>	<b><u>Date</u></b>	<b><u>Approximate Location</u></b>	<b><u>Complaint Allegations</u></b>
1	May 28, 2020	Lafayette Street to City Hall, Manhattan	<i>People</i> , ¶ 51 <i>Sow</i> , ¶ 65
2	May 28, 2020	Union Square, Manhattan	<i>People</i> , ¶¶ 128-132 <i>Payne</i> , ¶ 44 <i>Sow</i> , ¶ 65
3	May 29, 2020	Foley Square Manhattan to Near Barclays Center, Brooklyn via Brooklyn Bridge	<i>People</i> , ¶¶ 52, 193-195, 196-202 <i>Payne</i> , ¶ 45 <i>Sow</i> , ¶ 65 <i>Wood</i> , ¶¶ 45-47
4	May 29, 2020	Clinton Hill, Brooklyn	<i>People</i> , ¶¶ 52, 133-140, 223-226
5	May 29, 2020	Fort Greene, Brooklyn	<i>People</i> , ¶ 52
6	May 29, 2020	Bedford-Stuyvesant, Brooklyn (Herbert von King Park), Brooklyn	<i>People</i> , ¶¶ 141-149, 161-163
7	May 29, 2020	Pacific Street and Flatbush Avenue, Brooklyn	<i>People</i> , ¶¶ 215-219 <i>Wood</i> , ¶¶ 48-50
8	May 29, 2020	Union Square, Manhattan	<i>People</i> , ¶ 52
9	May 29, 2020	Herald Square, Manhattan	<i>People</i> , ¶ 52
10	May 30, 2020	Jackson Heights, Queens	<i>People</i> , ¶ 53
11	May 30, 2020	Park Slope, Brooklyn	<i>People</i> , ¶ 53
12	May 30, 2020	East Flatbush, Brooklyn	<i>People</i> , ¶¶ 53, 312-317 <i>Sow</i> , ¶ 67
13	May 30, 2020	Near Bedford & Tilden Aves., Brooklyn	<i>People</i> , ¶¶ 178-192, 235-236
14	May 30-31, 2020	Barclays Center to Flatbush Extension, Brooklyn	<i>People</i> , ¶¶ 203-207, 107-114 <i>Payne</i> , ¶¶ 47-48, 107-115
15	May 30, 2020	Harlem / West Side Highway, Manhattan	<i>People</i> , ¶¶ 402-407
16	May 30, 2020	Union Square to FDR Drive/Lower East Side, Manhattan	<i>Payne</i> , ¶¶ 50, 117-123 <i>Sow</i> , ¶¶ 130-151
17	May 30, 2020	City Hall to Brooklyn Bridge, Manhattan	<i>Sow</i> , ¶¶ 152-177
18	May 31, 2020	Near Barclays Center, Brooklyn	<i>People</i> , ¶ 54 <i>Sow</i> , ¶ 68

<sup>2</sup> The allegations listed in this table reference those in the Amended Complaints in *People*, No. 21 Civ. 322 (ECF No. 51), *Payne*, No. 20 Civ. 8224 (ECF No. 54), *Sierra*, No. 20 Civ. 10291 (ECF No. 38), *Sow*, 21 Civ. 533 (ECF No. 49) and *Wood*, 20 Civ. 10541 (ECF No. 48) and the Complaint in *Yates*, No. 21 Civ. 1904 (ECF No. 1).

<b><u>Protest No.</u></b>	<b><u>Date</u></b>	<b><u>Approximate Location</u></b>	<b><u>Complaint Allegations</u></b>
19	May 31, 2020	Downtown Brooklyn to multiple bridges	<i>People</i> , ¶ 54
20	May 31, 2020	Brooklyn Bridge	<i>People</i> , ¶ 54
21	May 31, 2020	From Manhattan Bridge to Chinatown, Church Avenue, and/or across Canal Street, Manhattan	<i>People</i> , ¶ 54 <i>Yates</i> , ¶¶ 13-21 <i>Wood</i> , ¶¶ 51-54
22	May 31, 2020	Near Williamsburg Bridge, Manhattan	<i>People</i> , ¶ 54
23	May 31, 2020	Broadway to E. 11 <sup>th</sup> St. & Near Union Square, Manhattan	<i>People</i> , ¶¶ 155-160, 231-234  <i>Payne</i> , ¶¶ 125-130
24	May 31, 2020	Times Square, Manhattan	<i>People</i> , ¶ 54
25	May 31, 2020	F.D.R. Drive, Manhattan	<i>People</i> , ¶¶ 208-210
26	June 1, 2020	Midtown, Manhattan	<i>People</i> , ¶¶ 55, 227-230 <i>Payne</i> , ¶ 53 <i>Sow</i> , ¶¶ 208-219
27	June 1, 2020	East Village, Manhattan	<i>People</i> , ¶ 55
28	June 1, 2020	Near Union Square Park, Manhattan	<i>People</i> , ¶ 55 <i>Payne</i> , ¶ 53
29	June 1, 2020	Near Barclays Center, Brooklyn, Crossing Manhattan Bridge into Times Square & Near Port Authority, Manhattan	<i>People</i> , ¶ 55 <i>Sow</i> , ¶¶ 180-206
30	June 1, 2020	Fordham Manor, Bronx	<i>People</i> , ¶ 55
31	June 1, 2020	Astoria Park, Queens	<i>People</i> , ¶ 55
32	June 1, 2020	Flushing, Queens	<i>People</i> , ¶ 55
33	June 2, 2020	Lower Manhattan/Foley Square to Central Park, Manhattan	<i>People</i> , ¶¶ 56, 318-323 <i>Payne</i> , ¶¶ 131-136
34	June 2, 2020	Union Square, Manhattan	<i>People</i> , ¶¶ 56
35	June 2, 2020	Near Barclays Center, Brooklyn to Manhattan Bridge	<i>People</i> , ¶¶ 330-336
36	June 2, 2020	Upper West Side, Manhattan	<i>People</i> , ¶¶ 56, 423-430
37	June 2, 2020	Astor Place, Manhattan	<i>People</i> , ¶ 56
38	June 2, 2020	Chelsea, Manhattan	<i>People</i> , ¶ 56 <i>Payne</i> , ¶ 54
39	June 2, 2020	Near West Side Highway, Manhattan	<i>Payne</i> , ¶ 54 <i>Sow</i> , ¶¶ 220-237, 239-282
40	June 2, 2020	Bryant Park to Midtown, Manhattan	<i>People</i> , ¶ 57 <i>Wood</i> , ¶¶ 55-59
41	June 3, 2020	Cadman Plaza, Brooklyn	<i>People</i> , ¶¶ 57, 164-168, 337-346 <i>Payne</i> , ¶¶ 55, 143-159

<b><u>Protest No.</u></b>	<b><u>Date</u></b>	<b><u>Approximate Location</u></b>	<b><u>Complaint Allegations</u></b>
			<i>Sow, ¶ 83</i> <i>Wood, ¶¶ 65-66</i>
42	June 3, 2020	Maria Hernandez Park, Brooklyn	<i>People, ¶ 57</i>
43	June 3, 2020	Midtown East/Upper East Side, Manhattan	<i>People, ¶¶ 57, 237-246, 347-354</i> <i>Sow, ¶ 84-85, 284-309</i> <i>Wood, ¶¶ 60-64</i>
44	June 4, 2020	Mott Haven, Bronx	<i>People, ¶¶ 58, 169-170, 247-255, 284-310, 366-387</i> <i>Wood, ¶¶ 116-167</i> <i>Payne, ¶¶ 59-65, 161-173, 182-192, 194-200</i> <i>Sierra, ¶¶ 41-124</i> <i>Sow, ¶¶ 86-93, 310-329, 332-345, 348-390, 392-418</i>
45	June 4, 2020	McCarren Park to South Williamsburg, Brooklyn	<i>People, ¶¶ 355-365</i> <i>Payne, ¶¶ 58, 202-206</i> <i>Wood, ¶¶ 67-68</i> <i>Sow, ¶ 84-85</i>
46	June 4, 2020	Clinton Hill and Prospect Heights, Brooklyn	<i>People, ¶ 59</i>
47	June 4, 2020	Flatbush, Brooklyn	<i>People, ¶ 59</i>
48	June 4, 2020	Brooklyn Bridge	<i>People, ¶ 59</i>
49	June 4, 2020	Midtown, Manhattan	<i>People, ¶ 59</i>
50	June 4, 2020	Flushing, Queens	<i>People, ¶ 59</i>
51	June 4, 2020	Central Park West, Manhattan	<i>People, ¶ 59</i>
52	June 5, 2020	Crown Heights, Brooklyn	<i>People, ¶ 60</i>
53	June 5, 2020	Sunset Park, Brooklyn	<i>People, ¶ 60</i>
54	June 5, 2020	Staten Island	<i>People, ¶ 60</i>
55	June 5, 2020	Near Gracie Mansion, Manhattan	<i>People, ¶ 60</i>
56	June 5, 2020	Barclays Center to Downtown Brooklyn	<i>People, ¶ 60</i>
57	June 5, 2020	Nostrand Ave., Brooklyn	<i>Payne, ¶ 71</i>
58	June 6, 2020	Financial District, Manhattan	<i>People, ¶ 61</i>
59	June 7, 2020	Upper East Side, Manhattan	<i>People, ¶ 61</i>
60	June 8, 2020	Times Square, Manhattan	<i>People, ¶ 61</i>
61	June 14, 2020	Times Square, Manhattan	<i>Payne, ¶ 74</i>
62	June 28, 2020	Foley Square to West Village, Manhattan (incl. Washington Square Park)	<i>People, ¶ 62</i> <i>Payne, ¶¶ 78, 174-180, 209-210</i>
63	June 23-30, 2020	City Hall Park, Manhattan	<i>Payne, ¶ 74</i>

<b><u>Protest No.</u></b>	<b><u>Date</u></b>	<b><u>Approximate Location</u></b>	<b><u>Complaint Allegations</u></b>
64	July 3, 2020	City Hall Park, Manhattan	<i>People</i> , ¶ 63
65	July 11, 2020	Dyker Heights, Brooklyn	<i>Sow</i> , ¶ 101
66	July 12, 2020	Bay Ridge, Brooklyn	<i>Sow</i> , ¶ 102
67	July 15, 2020	Brooklyn Bridge Pedestrian Path	<i>People</i> , ¶¶ 408-421
68	July 28, 2020	Kips Bay, Manhattan	<i>People</i> , ¶ 64
69	September 11, 2020	McCarren Park, Brooklyn	<i>People</i> , ¶ 65
70	September 17, 2020	Foley Square, Manhattan	<i>Payne</i> , ¶ 76
71	September 19, 2020	Times Square, Manhattan	<i>Payne</i> , ¶ 77
72	September 26, 2020	Washington Square Park and Near Sixth Precinct Stationhouse, Manhattan	<i>People</i> , ¶ 66
73	October 6, 2020	Borough Park, Brooklyn	<i>Sow</i> , ¶ 103
74	October 7, 2020	Bedford-Stuyvesant, Brooklyn	<i>People</i> , ¶ 67
75	October 25, 2020	Coney Island, Brooklyn to near Trump Tower, Manhattan, to Brooklyn Park	<i>Sow</i> , ¶ 104
76	November 1, 2020	Hell's Kitchen, Manhattan	<i>Sow</i> , ¶ 105
77	November 4, 2020	Washington Square Park, W. 8 <sup>th</sup> and Greenwich Ave., Manhattan	<i>People</i> , ¶¶ 68, 388-389
78	November 4, 2020	Central Park to Union Square, Manhattan	<i>People</i> , ¶ 68, 390-393 <i>Payne</i> , ¶ 78
79	November 5, 2020	West Village to Union Square, Manhattan	<i>People</i> , ¶ 69 <i>Payne</i> , ¶ 79
80	December 2, 2020	Staten Island	<i>Sow</i> , ¶ 106
81	December 11, 2020	Downtown Brooklyn	<i>People</i> , ¶ 70
82	January 12-16, 2021	Downtown Brooklyn	<i>Payne</i> , ¶ 138
83	January 18, 2021	Barclays Center, Brooklyn to City Hall Park, Manhattan	<i>People</i> , ¶¶ 71, 112-113 394-398 <i>Payne</i> , ¶¶ 80, 139-140